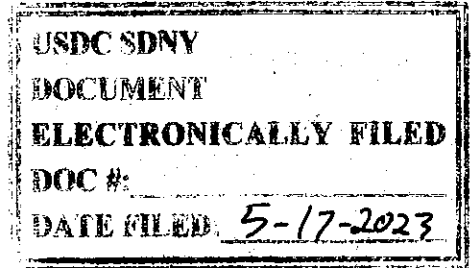


MEMO ENDORSED

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May 15, 2023

VIA ECF

The Honorable Lewis A. Kaplan
United State District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *Telecom Business Solution, LLC, et al. v. Terra Towers Corp., et al.*
Case No. 1:22-cv-01761-LAK

Dear Judge Kaplan:

We represent Respondents/Cross-Petitioners Terra Towers Corp., TBS Management S.A., and DT Holdings, Inc.. Pursuant to Federal Rule of Civil Procedure 5.2(d), Respondents/Cross-Petitioners respectfully seek leave to file their Reply Memorandum of Law in Further Support of their Cross-Petition to Vacate the Third Partial Final Award under seal.

The Arbitration out of which this proceeding arises is governed by a procedural order that requires the parties to:

treat the details of the Arbitration as private and confidential, except to the extent necessary to comply with mandatory applicable laws, including regulatory obligations, court orders, or orders of a regulatory or an administrative body, or to comply with obligations to insurers, auditors, accountants, or investors. In such cases, the disclosure shall not extend beyond what is legally required and any non-governmental recipients shall commit to maintain the information in confidence.¹

This order is consistent with the confidentiality provisions of the parties' underlying Shareholders Agreement, under which each party agreed not to disclose any confidential information disclosed to it by another shareholder or the Company, subject to limited

¹ Procedural Order No. 2, ¶ 22 (ECF No. 6-1).

SO ORDERED

LEWIS A. KAPLAN, USDC

5/17/2023

Granted.